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1 UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF CALIFORNIA

3 Christoper Kohls, et al.,

4 *Plaintiffs,*

5 v.

6 Rob Bonta, et al.,

7 *Defendants.*

Case No. 2:24-cv-02527-JAM-CKD

**Plaintiffs’ Notice of
Supplemental Authority**

Judge: John A. Mendez

9 Plaintiffs The Babylon Bee, LLC, Kelly Chang Rickert, Christopher Kohls,
10 Rumble Inc. and Rumble Canada Inc., and X Corp. submit this notice under Local
11 Rule 230(m) to bring the Court’s attention to *Free Speech Coalition, Inc. v. Paxton*,
12 No. 23-1122, 2025 WL 1773625 at *11–12 (U.S. June 27, 2025) (recognizing that
13 strict scrutiny “is ‘the most demanding test known to constitutional law,’” is
14 “unforgiving because it is the standard for reviewing the direct targeting of fully
15 protected speech,” and “succeeds in [its] purpose if and only if, as a practical matter,
16 it is fatal in fact absent truly extraordinary circumstances”); *see also id.* at *11 (“In
17 the First Amendment context, we have held only once that a law triggered but
18 satisfied strict scrutiny” in a case involving “an unusual application of strict
19 scrutiny” “in the context of ‘national security and foreign affairs’”). This opinion is
20 relevant to Plaintiffs’ arguments on the strength of the strict scrutiny test, given
21 that the parties agree that the laws at issue here are content-based. *See* Resp.
22 Opp’n Defs.’ Mot. S. J. and Supp. Pls.’ Mot. S. J. on AB 2839 16–19, 23–24, Doc. 78;
23 Pls.’ Resp. Defs.’ Mot. S. J. on AB 2655 13–14, 18, 21–22, Doc. 79.

24 DATED: July 14, 2025

25
26 /s/ Johannes Widmalm-Delphonse
27 ALLIANCE DEFENDING FREEDOM

/s/ Adam E. Schulman

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PROOF OF SERVICE

I hereby certify that I filed a true and accurate copy of the foregoing document with the Clerk of Court using the CM/ECF system, which automatically sends an electronic notification to all counsel of record.

DATED this 14th day of July, 2025.

/s/ Johannes Widmalm-Delphonse
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